
EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PAULA PAGONAKIS,)
)
Plaintiff,)
) Civil Action
v.) No. 06-027
)
EXPRESS LLC, a/k/a)
LIMITED BRANDS, INC.,)
)
Defendant.)

Deposition of ELISE ZAPP taken pursuant to notice at the law offices of Aber, Goldlust, Baker & Over, 702 King Street, Wilmington, Delaware, beginning at 2:00 p.m. on Monday, February 26, 2007, before Kurt A. Fetzer, Registered Diplomate Reporter and Notary Public.

APPEARANCES:

JASON H. EHRENBURG, ESQ. (Via teleconference)
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1 Q. So you don't know whether anybody might have
2 complained about Ana Klancik treating them differently
3 because they were disabled?

4 A. I have never heard of anyone saying that.

5 Q. Have you heard of anyone saying that she
6 treated them differently or unfairly for any reason?

7 A. No.

8 Q. Are you aware whether or not -- one moment,
9 please.

10 Do you know whether any employee has ever
11 filed a lawsuit against Express, anyone that worked in
12 the Christiana store other than Paula Pagonakis?

13 A. Not to my knowledge.

14 Q. Do you know whether any employee of Express in
15 any of the other stores that Ana Klancik would have
16 been responsible for have ever filed a complaint
17 against Express?

18 A. Not to my knowledge.

19 Q. Okay. I believe you said at some point Paula
20 was promoted from part-time sales manager to brand
21 sales lead?

22 A. She was a part-time sales associate and she was
23 promoted to a part-time brand sales lead.

24 Q. Do you know whether she was ever promoted from



1 making such comments. I'm just asking if while Paula
2 was employed do you recall making any such comment?

3 A. No, I do not recall.

4 Q. So if Paula has alleged that she overheard you
5 making such comments, would that be incorrect?

6 A. Yes.

7 MR. EHRENBURG: Dave, I think I'm about
8 ready to wrap up, if you can just give me about two
9 minutes so I can see if I have any further questions.

10 MR. CAMPBELL: Okay. We're going to step
11 out for about two or so and then we will let you know
12 once we come back in.

13 MR. EHRENBURG: All right. Thank you.

14 (A brief recess was taken.)

15 MR. EHRENBURG: I do have just a few more
16 questions.

17 MR. CAMPBELL: Okay.

18 BY MR. EHRENBURG:

19 Q. Ms. Zapp, Paula has alleged in this lawsuit
20 that in or around November, late November of 2003
21 Express stopped providing accommodations to her and I
22 guess my question is: Do you have any knowledge about
23 whether Express provided Paula with any accommodations
24 after she was promoted to a comanager?

